#### **REMARKS**

Claims 1-11 are pending in the application. Claims 1-5 and 8-10 have been withdrawn from consideration. Claims 6, 7 and 11 are currently under consideration and were rejected as follows:

Claims / Section	35 U.S.C. Sec.	References / Notes
6, 7	§112, Second Paragraph	Indefinite language
6, 7, 11	§102(b) Anticipation	<ul> <li>Brekelbaum (U.S. Patent No. 3,944,203).</li> </ul>

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Claim 12 has been added to provide a further limitation that these hole groups comprise a minimum of 12 holes, and claim 13 has been added to add a relationship element between the router and the router table holes. Applicants believe that these features are not found in the prior art of record.

Claim 6 has been amended solely for the purpose of correcting a typographical error and should in no way be construed as a narrowing amendment in accordance with *Festo*. Applicants have provided arguments distinguishing the present invention from the art cited against it.

## 35 U.S.C. §112, Second Paragraph, Indefiniteness

1. Hole pattern Groups A-F and the threaded pilot pinhole and pilot pin storage hole are clearly defined in the specification.

In the Office Action, on p. 2, the Examiner indicates that it is unclear what hole pattern groups A-F and the threaded pilot pinhole and pilot pin storage hole refer to.

These hole groups are not referred to in the claims as generic hole groups, but rather as specific hole groups having a specific arrangement as defined in the Specification in the text beginning with paragraph 72 and extending through paragraph 82. The use of the capital letters in the claims identifying "Group x" holes indicates that it is these specific hole patterns, including specific radial and angular dimensions, that are being claimed, and not generic groupings of holes.

Support for the pilot pin hole and the pilot pin storage hole is found in the Specification at paragraph 83.

These hole groupings are also clearly indicated in Figs. 13 and 14.

According to MPEP §2111.01, an applicant may be his or her own lexicographer as long as the meaning assigned to the term is not repugnant to the term's well known usage. Any special meaning assigned to a term must be sufficiently clear in the specification.

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In this instance, Applicants have defined the Group x holes in a manner that would not be repugnant to any ordinary meaning assigned to them and have very clearly defined these terms, devoting 12 paragraphs, three tables, and two figures in the Specification to the meaning assigned to these terms.

For these reasons, Applicants respectfully request that the 35 U.S.C. §112 rejection be withdrawn from the application.

# 35 U.S.C. §102(b), Claims 6, 7, and 11 Anticipation by Brekelbaum

2. Brekelbaum discloses a table for supporting material cut by an oxidation cutting operation and not a router table.

In the Office Action on p. 3, the Examiner indicated that Brekelbaum discloses a table comprising at least five hole pattern groups in a table top in which each group comprises at least two holes.

Applicants note that Brekelbaum does not teach or suggest a router table, but rather teaches a table that is used with supports for the work piece that is being operated on by an overhead tool for an oxidized cutting operation. The act of routing involves different configurations of the tool with respect to the table that would not work with the configuration taught by Brekelbaum.

Since Brekelbaum lacks any teaching or suggestion of how its table could be configured to accommodate a router, it cannot anticipate claim 11 of the present invention.

3. Brekelbaum does not show a router table top having Group B through Group F holes.

In the Office Action on pp. 2-3, the Examiner indicated that independent claim 6 and dependent claim 7 were anticipated by Brekelbaum because Brekelbaum discloses a table comprising at least five hole pattern groups in a tabletop with each group comprising at least two holes.

Applicants respectfully contend that Brekelbaum does not teach Group B through Group F holes as required by claim 6 of the present application. These hole groups, as explained above, refer to the particular groupings with hole positions as defined in the Specification. The terms "Group x" do not refer to generic groupings of holes. The use of capital letters in referring to these groups indicates Applicants' intention of using these terms in a specific way and that these terms should be interpreted in light of the definitions given in the Specification.

Since Brekelbaum does not teach or suggest hole Groups B through F, it cannot anticipate the present invention. For these reasons, Applicants respectfully ask that the 35 U.S.C. §102 rejection be withdrawn from the present application.

#### CONCLUSION

Inasmuch as each of the objections have been overcome by the amendments, and all of the Examiner's suggestions and requirements have been satisfied, it is respectfully requested that the present application be reconsidered, the rejections be withdrawn and that this application be passed to issue.

Respectfully submitted,

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## **CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Assistant Commissioner for Patents, Washington, D.C. 20231 on November 5, 2002.

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# APPENDIX CLAIM MARK UPS

6. (Amended) A router table having a table top, comprising hole pattern
 groups having Group B holes, Group C holes, Group D holes, Group E holes, and Group [group] F holes within said table top.